

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**PATRICK G. BRADY, ESQ. (PB-6513)**  
**CARPENTER, BENNETT & MORRISSEY**  
 Three Gateway Center  
 100 Mulberry Street  
 Newark, New Jersey 07102-4079  
 (973) 622-7711  
 Attorneys for Defendant  
 Home Depot U.S.A., Inc.

TRACEY DOWLING,

Plaintiff,

VS.

THE HOME DEPOT,

Defendant.

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CIVIL ACTION NO. 02-CV- 3181

CIVIL ACTION

# CERTIFICATION OF PATRICIA SINGELYN

**PATRICIA SINGELYN**, of full age, certifies as follows:

1. I am employed by Home Depot U.S.A., Inc. (hereafter “Home Depot”) as field implementation manager located at Home Depot’s Mid Atlantic Division in South Plainfield, New Jersey. I submit this certification in support of Home Depot’s Motion for Summary Judgment to dismiss plaintiff Tracey Dowling’s Complaint. The source of the information provided herein is personal knowledge acquired during my employment with Home Depot.

2. From approximately November 1998 to November 2000, I was the administrative assistant store manager at Store 4105 in Bethlehem, Pennsylvania (“Bethlehem Store”). During this period of time (until October 2000), Tracey Dowling was the loss prevention supervisor assigned to the Bethlehem Store.

3. I have reviewed Ms. Dowling’s Certification wherein she states that she believes she worked well with the employees in the Bethlehem Store, and in support, refers to her relationship with me.

4. Though my personal relationship with Ms. Dowling was cordial, on a professional level, during the time that Ms. Dowling was the loss prevention supervisor in the Bethlehem Store, I was critical of her performance. On numerous occasions, I complained to Alan Power, store manager of the Bethlehem Store, about Ms. Dowling’s management style. For example, Ms. Dowling, at various times, undermined my authority as an assistant store manager by telling associates within my department to ignore my directives. On other occasions, Ms. Dowling had a confrontational style with associates in the store.

5. Ms. Dowling also did not work with the management team or receive their input in creating a shrink plan for the Bethlehem Store.

6. In or about June 2000, Ms. Dowling asked me to help her achieve her goals as a loss prevention supervisor. I advised Ms. Dowling, in general, how I would approach the job duties of loss prevention supervisor if I were in that position.

I certify under penalty of perjury that the foregoing statements made by me are true and correct. Executed on December 12, 2002.

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PATRICIA SINGELYN